RÉCEIVED FEDERAL ELECTION COMMISSION

April 22, 2014

2014 APR 23 PX 12: 53

OFFICE OF CENTRAL COUNCIL

MUR # 680

Office of General Counsel Federal Election Commission 999 E Street, NW Washington, D.C. 20463

RE: <u>COMPLAINT OF VIOLATION OF FEDERAL ELECTION CAMPAIGN LAWS AND/OR COMMISSION</u>
REGULATIONS

Complainant:

Mr. Chad Lee Choat

Claremore, OK 74017

Respondents:

- 1. Michael Jeffrey Turner, Republican Candidate for Congress in the 5th District of Oklahoma
- 2. Mike Turner for Congress, Principal Campaign Committee
- Kyle Walton Denham, Treasurer, Mike Turner for Congress 615 N Hudson, Suite 320 Oklahoma City, OK 73102

Description of Violation(s)

On March 6, 2014 Mr. Michael Jeffrey Turner officially announced his candidacy for the 5th congressional district of Oklahoma. His press release was carried by multiple media outlets and his own website http://mikeforthehouse.com/media/).

Mr. Turner prepared his FEC Form 2 (Statement of Candidacy), designating Mike Turner for Congress as the Principal Campaign Committee, on March 6, 2014 and it was received by the FEC on March 13.

FEC rules provide that within 10 days of filing the FEC Form 2, a candidate must file FEC Form 1 (Statement of Organization).

This rule was not complied with, and as a result for more than 1 ½ months there was no public disclosure of the officers responsible for compliance with federal campaign law nor even at what institution campaign funds were held. When the Form 1 was finally hand-delivered to the FEC on April 15, 2014, it appeared to be backdated to March 7, 2014 by Mr. Turner or Mr. Denham.

FEC rules provide that quarterly statements (FEC Forms 3) are required to disclose to the public how much and from whom campaign funds were raised, and to whom and for what purpose campaign funds were disbursed. The initial quarterly report was due on April 15, 2014, which according to news accounts should have shown that Mr. Turner raised a minimum of \$500,000 and spent about \$170,000, far and away the most of any candidate for this office (http://newsok.com/self-funded-oklahoma-legislator-has-most-money/article/3986512).

(Commission Expiration)

This rule was not complied with, and the result is that apparently massive amounts of cash has been raised, and equally massive amounts have been disbursed, without any accountability to the public by what has become an illegally operated campaign organization.

As of April 22, 2014, a search of the fec.gov public disclosure website showed no FEC Form 3 for the campaign.

As noted above, Mr. Turner has given interviews stating that as of March 31st his campaign had spent \$170,000 on services ranging from polling with Wilson, Perkins, Allen Opinion Research, to TV advertisements and multiple mailers (see attachments).

Since that time, my understanding is that there has been additional advertising, and even more mailers, with estimates placing the total spent at more than \$225,000. Mailers and advertising all appear to include the words "Paid for by Turner for Congress".

	the words "Paid for by Turner for Congress".
/	Thank you for your attention to this matter.
	Chad Choat
	Claremore, OK 74017
	SUBSCRIBED AND SWORN BEFORE ME IN THE COUNTY OF ROOFS, STATE OF OKLAHOMA, ON THIS 22M DAY OF APRIL, 2014.
	(Notary's official signature)
	10-05-2017 Exp. 10-06-2017

_				Incumbent		·			
				/Challenger			Cash On		Date
_	Candidate(+) DAVENPORT, KEITH	05	Party DEMOCRATIC PARTY	/ Open	Receipts Receipts \$0 Individual \$0 PAC \$0 Party \$0 Candidate \$0 Other \$0	<u>Disbursements</u> \$0	Hand \$0	Debt \$0	Through
0	DOUGLAS, PATRICE	05	REPUBLICAN PARTY	OPEN	Receipts \$404,537 Bindividual \$394;287 B PAC \$10,250 B Party \$0 **Candidate \$0 B Other \$0	\$32,010	\$372,527	\$0	ó3/31/2014
a	GUILD, THOMAS	05	DEMOCRATIC PARTY	OPEN '	Receipts \$43,740 Mindividual \$23,614 # PAC \$0 # Party \$100 3:Candidate \$19,100 # Other \$926	\$21,066	\$22,674	\$19,100	: 03/31/2014
<u>.</u>	JETT, SHANE DAVID	05	REPUBLICAN PARTY	OPEN	Receipts \$43,821 IIIndividual \$37,750 II PAC \$0 III Party \$0 III Candidate \$0 III Other \$6,071	\$2,766	\$41,055	\$0	03/31/2014
0	JOLLEY, JOSEPH CLARK	05	REPUBLICAN PARTY	OPEN	Receipts \$177,905 ■Individual \$166,305 ■ PAC \$11,600 ■ Party \$0 ※Candidate \$0 ■ Other \$0	\$9,281	\$168,624	, \$0	03/31/2014
0	MCAFFREY, AL	05	DEMOCRATIC PARTY	OPEN	Receipts \$50,530 ■Individual \$50,430 ■ PAC \$0 ■ Party \$0 ⊴ Candidate \$100 ■ Other \$0	\$25,029	\$25,501	\$100	03/31/2014
0	RUSSELL, STEVEN DANE	05	REPUBLICAN PARTY	OPEN	Receipts \$106,953 Individual \$106,953 PAC \$0 Party \$0 Candidate \$0 Cher \$0	\$14,942	\$92,011	\$0	03/31/2014
0	SPARKS, HARVEY	05	REPUBLICAN PARTY	OPEN	Receipts \$17,891 Individual \$17,891 PAC \$0 Party \$0 Candidate \$0 Other \$0	\$6, <i>4</i> 70	\$11,421	\$0	03/31/2014
0	TURNER, MICHAEL JEFFREY	05	REPUBLICAN PARTY	OPEN	Receipts \$0 Individual \$0 PAC \$0 Party \$0 Candidate \$0 Other \$0	\$0	\$0	\$0	

PAC LESS .	Ĭ.				CHIS-19-1	to it of fix Mert Seath Tool by W	entrine 17 ce	Ken ton Spatial]	
		SUM.	i.s	Kepublican Fart	CPEN	Rereipts\$177,905 Indicatival \$166,305 IN PARTY \$0 Candidate \$6	\$9,28	1 \$168,624	\$0 93/31/301 4		•
		Kitai iren B	25	DEXECTATION FARTY	0-7.	Wother \$0 Receipts \$50,530 Innihim \$50,430 2 PAC \$0 2 PARY \$0 Carbonic \$140 E Carbonic \$130 E Carbonic \$1	\$25,02	9 \$75,501	\$100 0%31/20 14	·	
		v¥K*	25	257,732000 533,74	0781	Récelptasion.ess industries 108,953 if FAC 10 # Party 50 Candidate 50 Candidate 53	514,04	2 \$42,781	40 JE752 2014		
				667 - Se3274	¢>3··	Receipts \$17,591	\$9,47	3 \$21.4Ct	** 03'31'2074		
		Production of Constitution	1:			Receipts 5. 10 10 10 10 10 10 10 10 10 10 10 10 10		. ga	aŭ.	 	

				•		Data Catalog ▼	[] www.fecgov/
	Indi:1821.3	######################################	Section States	Cash on Hand Cash on Hand Cash Specific	RUS RUSSELL STIWEN DANK TÜRNEK BIICHAELJEIFREN	DOUGLAS, PATRIGE DOLLTY, JOSEPH GLARK	www.fecgov/disclosurehs/H5LandCompare.do



multiple mailers listing candidate committee "Paid for by Mike Turner for Congress"



